

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	:
	:	No. 7:19-cr-881 (KMK)
- v. -	:	:
	:	:
ARNOLD KLEIN, et ano.	:	
	:	
Defendants.	:	
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**LEON KLEIN’S
SENTENCING MEMORANDUM**

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Attorneys for Defendant Leon Klein

A. Introduction. This memorandum and the accompanying exhibits, including the many letters of support, are submitted on behalf of defendant Leon Klein (“Leon” to distinguish him from his brother and codefendant Arnold Klein) in support of his motion for a downward variance, and more generally to assist the Court in determining the appropriate sentence to impose upon him. Leon will stand before the Court for sentencing as an elderly, first-time offender upon his plea of guilty to a superseding information charging him with conspiracy to operate an unlicensed money transmission business. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED],

we ask the Court to impose a sentence of either time served or probation so that Leon can continue to focus [REDACTED] and what will hopefully be a long life together with his devoted wife, six daughters, more than 60 grandchildren and great-grandchildren, many of whom have written letters to the Court concerning Leon’s magnanimous character.

[REDACTED], in our view Leon is an eminently qualified candidate for a non-custodial sentence based on his extraordinarily generous spirit, good nature and good deeds, all reflected in the accompanying laudatory, sincere and moving letters.

B. Leon Klein's Background and Character. As reflected in the PSR, Leon is a native Canadian born to Holocaust-survivor parents. Leon at a young age came to the United States to pursue his religious studies and ultimately it was here in New York that

he met his wife of nearly fifty years, Rivka Lea. Leon has resided in the United States as green card holder ever since. Already as young adult, Leon's character stood out. *See* Exhibit A (Letter of Rabbi Jacob Tannenbaum) (Rabbi Tannenbaum grew up with Leon and they were classmates and close friends; "Mr. Klein was even then a very warm, caring person and an accomplished student. He was always concerned about the well-being of all his friends and classmates."); (Letter of Herman Freund) ("Leon was an exemplary student with above average grades and outstanding character I was extremely proud that we became brothers in law").

As the many letters of support indicate, Leon is the consummate gentleman and family man who is extremely devoted to his large family and lives to help others. All of the moving letters of support are summarized in the accompanying appendix but to provide the Court a taste of Leon's devotion to his family, here we quote a few. For example, Baila Hirsch, one of Leon's many grandchildren, describes how she and all her cousins look forward to the start of the Jewish month when Leon makes sure to get all of the grandchildren special seven-layer cake "to start the month with something sweet." Baila's letter describes the close familial relationship Leon has with her and her cousins and how he is always looking out for their wellbeing. Similarly, Esther Hirsch, who goes to her grandparent's home every Friday to assist with the Sabbath preparations, notes that even when she's feeling down and doesn't feel up to going, she makes sure to go since the "warm atmosphere" and the "good feelings" Leon showers her with will inevitably cheer her up.

Channie Lev, one of Leon's daughters, writes that when she had an accident at 3 AM one day it was Leon who came in middle of the night to help her. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

He serves as an emotional therapist for my family. He keeps my family together. It is definitely to his (and my mother's) credit that my kids are coping with the ongoing situation. I can't imagine going through such difficult times without his emotional support. My situation is still ongoing. We still need his support.

Exhibit A (Letter of Channie Lev).

Leon's devotion to others, however, is not limited to family. Whether it is lending a listening ear to a forlorn member of the community, restoring peace between the school staff and one of their students or the student's parents, or driving a grandchild in grandpa's taxi to run an errand or to take a random community member to work or rushing out in middle of the night to accompany a grown child that needed emergency medical treatment,

Leon was always there. For example, Yoel Berger, one of Leon's sons-in-law, describes how even after Leon was dealing with his own condition he did not refrain from helping others: "I remember someone reaching out to him for help, unaware of his medical condition. It was unbelievable to see that despite his weakened state, he extended all his efforts to help these people through their own troubles." Exhibit A (Letter of Yoel Berger). Similarly, Blima Bikel, Leon's oldest granddaughter who is herself a mother of two children, describes how it was Leon who showed up with hot soup for her when she was recovering from the birth of her baby, and it was Leon who would frequently taxi her around town so she didn't have to incur the expense of taxis she couldn't really afford. But Leon's free "taxi" service was not simply for family. Instead, Blima describes how her grandfather would take "his car to pray every day. When asked why he wouldn't walk to get his daily exercise, he replied 'who will take home the several old men relying on my car ride?' Indeed, he always takes hitchhikers into his car and goes out of his way graciously to drop them off at their destinations. This is a classic example of the kind of man he is like with his generosity and kindness." Exhibit A (Letter of Blima Bikel).

Pinchas Brach, Leon's oldest son-in-law, describes how he observed Leon raising his family with exceptional devotion. "His family always comes before business or pleasure. It is his utmost pleasure to be the father and grandfather of his family." And when Mr. Brach's own father [REDACTED] shortly after his marriage, it was Leon who stepped in to be the father figure in Mr. Brach's life. When Mr.

Brach was experiencing serious eye troubles, it was Leon who researched doctors and accompanied him to all the appointments. Mr. Brach mentions several examples of individuals that he has witnessed to be the benefactors of Leon's kindness.

- "Rabbi G [REDACTED] an old lonely man. He would invite him for breakfast and sit with him while listening to his pain and warming his soul."
- "Mr. L [REDACTED], a broken soul struggling in his marriage. He puts in countless hours of listening and straightening things out for him."
- "An old lonely bachelor from Washington Heights who spends his day in Brooklyn. Whenever my father-in-law was in Brooklyn, he makes sure to give him a ride home. This person more than receiving a ride home, would be the recipient of my father-in-law's compassion and support."
- "M [REDACTED] B [REDACTED], a nephew from my side of the family. My father-in-law has given him, and still does, countless hours of guidance and support. Today he is a productive young man."

Exhibit A (Letter of Pinchus Brach); *see also id.* (Letter of M [REDACTED] Br [REDACTED]) ("Mr. Leon Klein was my lifesaver. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED].").

M [REDACTED] L [REDACTED] likewise views Mr. Klein as his "lifesaver." He describes how he arrived in the United States from Israel completely alone, he had gotten married but was having trouble adapting to his new environment. Leon noticed that he was in need of help. "From that very day he accepted me as part of his family . . . He always had a listening ear

to my worries, provided me with crucial emotional support and guided me through all my struggles. I was finally able to adjust accordingly, build a home of my own, build a family, and build my future. I could not have done it without Leon. He was absolutely not obligated to do even a bit for me, yet his benevolence and passion made him go out of his way despite his own busy schedule to help a person in need.” Exhibit A (Letter of Mo █████ L █████).

C. The Offense Conduct. As Leon writes the Court in his letter, coming so close to death’s door, as he has, has forced him to contemplate his life with far more candor or seriousness than he may otherwise have done. That introspection has made him realize just how problematic his conduct was and he does not seek to offer any excuses or rationalizations. Unfortunately, given his current predicament, it is questionable as to what opportunities he will have to make amends through his own actions. But Leon has made it a priority to guide his children and grandchildren concerning the importance of observing the law, not looking for loopholes and simply stated to stay away from any “shtick”, *i.e.*, gimmicks designed to avoid the law. *See* Exhibit B (Letter of Leon Klein).

Without minimizing his culpable participation in the instant offense, it is fair to say that even the government recognizes that Leon was the less culpable of the Klein brothers -- a contention that is confirmed by the fact that the Gemach account used to carry out the charged scheme was not managed by Leon, and that Leon only joined the offense somewhat late in the game, all of which is corroborated by both the lower agreed-upon loss figure and the minor role adjustment, along with the recordings made by the cooperating

witness which reveal that Leon did not participate in many of the meetings during which the offense was carried out, including many of the meetings referenced in the PSR. *See* Exhibit C (objections to the PSR).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

¹ <https://www.cancer.net/cancer-types/pancreatic-cancer/statistics#:>.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

² [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

E. The §3553(a) Factors. After *United States v. Booker*, 543 U.S. 220 (2005), the Court's sentencing discretion is guided by the factors set forth in 18 U.S.C. §3553(a), only one of which is the USSG calculation. Application of all the §3553(a) factors is governed

by the overriding principle that the Court “shall” impose a sentence “sufficient, but not greater than necessary” to fulfill the purposes of the criminal law, as set forth in §3553(a)(2), one of which is “just punishment” for the offense. The §3553(a) factors also include the history and characteristics of the defendant, protection of the public from further crimes by the defendant, and the kinds of sentences available. These factors all weigh in favor of leniency for Leon Klein. *United States v. Arteca*, 411 F.3d 315, 323 (2d Cir. 2005) (“Although the court made a significant downward departure from the applicable Guideline range [at his original sentencing], we cannot say as a matter of law that the same [higher] sentence would have been arrived at had the court regarded the Guidelines as advisory rather than mandatory”); *United States v. Ranum*, 353 F. Supp. 2d 984 (E.D. Wis. 2005).³

³. “[U]nder § 3553(a)(1) a sentencing court must consider the ‘history and characteristics of the defendant.’ But under the guidelines, courts are generally forbidden to consider the defendant’s age, U.S.S.G. §5H1.1, his education and vocational skills, §5H1.2, his mental and emotional condition, §5H1.3, his physical condition including drug or alcohol dependence, § 5H1.4, his employment record, §5H1.5, his family ties and responsibilities, §5H1.6, his socio-economic status, §5H1.10, his civic and military contributions, §5H1.11, and his lack of guidance as a youth, §5H1.12. The guidelines’ prohibition of considering these factors cannot be squared with the §3553(a)(1) requirement that the court evaluate the ‘history and characteristics’ of the defendant. The only aspect of a defendant’s history that the guidelines permit courts to consider is criminal history. Thus, in cases in which a defendant’s history and character are positive, consideration of all of the §3553(a) factors might call for a sentence outside the guideline range.” *Id.* at 986.

1. Nature and Circumstances of the Offense, and the History and Characteristics of the Defendant (§3553(a)(1)).

Leon has pled guilty and is embarrassed and ashamed of his conduct, even if he only played a “minor” role in what was, unbeknownst to him, only a sting operation. Leon does not seek to rationalize or defend his conduct and expresses his remorse for his conduct.

In contrast to even the minor role the government believed that Leon played, Leon is an extraordinarily good person who not only is extremely devoted to his family but has assisted many in the community providing succor and a listening ear to forlorn and lonely people and by mediating disputes to minimize strife. *See* Summary of Letters Appendix and Exhibit A (letters in support).

2. Traditional Sentencing Goals (§3553(a)(2)).

Society would inure no benefit by imprisoning someone [REDACTED].
Indeed, under §3553(a)(2)(D), a sentencing court is required to impose a sentence that accommodates the defendant’s needs, [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

3. The Kinds of Sentences Available (§3553(a)(3)).

Leon’s USSG range produces a sentencing range of 12-18 in Zone C. Yet, even the Probation Office, [REDACTED], recommends a sentence

nowhere near that but rather a 3-month sentence. [REDACTED]

[REDACTED]

[REDACTED]

A non-custodial sentence would be particularly appropriate and beneficial here because Leon, as a green card holder, faces the risk of removal from the United States. A non-custodial sentence gives Leon the best chance to avoid removal since he would not be entered into the BOP system, which could otherwise result in an ICE detainer. While counsel believes that Leon's guilty plea should not subject him to removal in any event, the BIA has not always taken consistent positions on this issue, indeed counsel for Arnold Klein has informed defense counsel that in Arnold's case, the immigration authorities initially took the position that he was subject to removal. Moreover, even if he is ultimately successful in avoiding deportation, an ICE detainer could mean months of immigration detention which for Leon which would be particularly devastating given Leon's current condition.

Based on the totality of Leon's circumstances and background, including his serious medical condition and his extraordinary good deeds, he is an appropriate candidate for a downward variance which would make him eligible for a sentence of time served or simple probation.

4. USSG and Departure Grounds (§3553(a)(4) and (5)). The parties agree with the USSG calculation set forth in the PSR.

Many defendants work on improving themselves after they are charged and plead guilty. [REDACTED]

[REDACTED] Leon has been helping others virtually all his adult life. Leon's lifetime of extraordinary good works, including devoting himself to the guidance of others and saving people from emotional issues and depression and from acrimony and strife, has been a way of life for Leon. Indeed, even after [REDACTED], Leon still searches out ways to help others, including by continuing to guide others even if only by phone when he can no longer do so in person.

Leon's extraordinary acts of kindness and charity towards members of the community like Moshe Brach and other noted above are not isolated or aberrational. They are a way of life for Leon.

As the foregoing examples make clear, Leon's devotion, assistance and contributions to the community, while at times financial, often consist of the far more telling and equally valuable contribution of his personal time and effort.

A lifetime of extraordinary good deeds like Leon's is a traditional and well-established ground for a downward variance. *See United States v. Woods*, 159 F.3d 1132, 1136-37 (8th Cir. 1998) (affirming downward departure where the defendant "brought into her own home two troubled young women," paid their private school tuition and helped them to become "productive members of society"); *United States v. Rioux*, 97 F.3d 648,

663 (2d Cir. 1996) (upholding downward departure based on, *inter alia*, defendant's charitable and civic good deeds, including his fundraising for the Kidney Foundation).

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

5. Sentencing Disparity (§3553(a)(6)). In *United States v. Westmoreland*, 2023 WL 204834, *5 (D. Minn. Jan. 17, 2023), the district court noted that granting compassionate release to a [REDACTED] “does not create an unwarranted sentencing disparity among otherwise similarly situated defendants,” since any resulting disparity is not “unwarranted” in view of the defendant’s health and age.

F. Conclusion. Leon regrets his participation in the instant offense. What he did was contrary to the values that he set for himself and sought to inculcate in his children. But Leon has another highly commendable side to him, one that is devoted to helping both family and strangers.

[REDACTED]

[REDACTED]

Dated: New York, New York
February 13, 2023

Respectfully submitted,

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by /s/
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**APPENDIX
SUMMARY OF LETTERS OF SUPPORT
(in alphabetical order)**

1. Baila Berger (granddaughter)

Baila Berger, Leon's 19-year-old granddaughter describes the loving relationship she enjoys with Leon. Baila describes how when she would sit in "Grandpa's Taxi," and she would observe how he was always talking on the phone to anonymous callers who he would patiently provide guidance with issues that they were dealing with. As a young woman herself, Baila now understands why so many people reach out to her grandfather given his patience and keen insight.

2. Blimie Berger (daughter)

Blimie Berger, Leon's third daughter, describes what it was like to grow up in the Klein household, the devotion Leon showed to his family whether it meant making a long mid-week trek to be with his wife and children while they were away for the summer, the devotion and respect he showed for his mother, his making sure that his children have the best medical advice or assisting with the care of her own children.

3. Chayala Berger (granddaughter)

Chayala Berger, Leon's 13-year-old granddaughter, writes that her grandfather is "the most compassionate man one has ever met. His answer is never 'no.' My grandfather cannot see [an] unrelated young man walk to his job on his way home from synagogue, and that's the way his day starts out by caring for all in his surroundings." Chayala lovingly concludes her letter that her "role model, pride and footsteps I hope to follow is 'Zeidy Klein' of course."

4. Yoel Berger (son-in-law; husband of Blimie)

Yoel describes how lucky he feels to be Leon's son-in-law, and how Leon constantly assists in caring for their family, and how his care and compassion extends way beyond his own family: Leon "has helped countless people and families, spending loads of his precious time, voluntarily helping people with the troubled marriage, or tearing them away from terrible addictions. With his compassion and wisdom, he sets them back on track." Yoel describes how this continued even after Leon was dealing with his own condition: "I remember someone reaching out to him for help, unaware of his medical condition. It was unbelievable to see that despite his weakened state, he extended all his efforts to help these people through their own troubles."

5. Blima Bikel (granddaughter)

Blima Bikel is Leon's oldest granddaughter and a mother of two children. Mrs. Bikel describes how it was Leon who showed up with hot soup for her when she was recovering from the birth of her baby, and it was Leon who would frequently taxi her around town so she didn't have to incur the expense of taxis she couldn't really afford. But it is not simply

family members to whom Leon provides his free “taxi” service. Leon “takes his car to pray every day. When asked why he wouldn’t walk to get his daily exercise, he replied ‘who will take home the several old men relying on my car ride?’ Indeed, he always takes hitchhikers into his car and goes out of his way graciously to drop them off at their destinations. This is a classic example of the kind of man he is like with his generosity and kindness.”

6. Joseph Bikel (grandson-in-law; Blima’s husband)

Mr. Bikel describes that although he has only been part of the family for four years, Leon has quickly become his role model since “the word ‘no’ does not exist in his dictionary when it comes to helping someone else.”

7. M ■ B ■ (individual helped by Leon Klein)

Mr. B ■ describes how eight years ago his life began to fall apart as his parents had divorced, his own marriage was falling part and he had two young children on his hands:

Mr. Leon Klein was my lifesaver. He stepped into my life and lent me a listening ear and a shoulder to cry on. I felt I had one person who really cared for me. He was the one who put the puzzle pieces of my life together again.

Thanks to him I am now married and have a stable job. Mr. Leon Klein is not a family member of mine, nor is he a therapist. And yet this kind man has gone above and beyond to help me. And he still does.

8. Pinchas Brach (son-in-law)

Mr. Brach, Leon’s oldest son-in-law describes how he observed Leon raising his family with exceptional devotion. “His family always comes before business or pleasure. It is his utmost pleasure to be the father and grandfather of his family.” And, when Mr. Brach’s own father was diagnosed ■ ■ ■ ■ ■ shortly after his marriage, it was Leon who stepped in to be the father figure in Mr. Brach’s life. When Mr. Brach was experiencing serious eye troubles, it was Leon who researched doctors and accompanied him to all the appointments. Mr. Brach mentions several examples of individuals that he has witnessed to be the benefactors of Leon’s kindness.

- Rabbi G ■ ■ ■ ■ ■, an old lonely man. He would invite him for breakfast and sit with him while listening to his pain and warming his soul.
- Mr. L ■ ■ ■ ■ ■, a broken soul struggling in his marriage. He puts in countless hours of listening and straightening things out for him.
- An old lonely bachelor from Washington Heights who spends his day in Brooklyn. Whenever my father-in-law was in Brooklyn, he makes sure to give

him a ride home. This person more than receiving a ride home, would be the recipient of my father-in-law's compassion and support.

- M ■■■ B ■■■, a nephew from my side of the family. My father-in-law has given him, and still does, countless hours of guidance and support. Today he is a productive young man.

9. Zissy Brach (daughter)

Zissy Brach is the oldest Klein daughter and she describes the home she grew up in, one of “harmony and love” where her parents “always worked together as a team. They were always on the same page, not because they always had the same opinion but because they made a conscious effort to raise us in a happy and healthy home.” Even after their marriage, Zissy describes how she and her siblings remain closely connected to her parents. [REDACTED]

_____.” Zissy concludes with a plea to the Court, “Your Honor, please have mercy on my parents and us children and grandchildren. Allow my father to proceed his healing and enjoy his life next to his family.”

10. Herman Freund (brother-in-law)

Mr. Freund has known Leon from their school days together even before Leon married his sister. Already then, Leon displayed “outstanding character.” Leon would always make the trip from Monroe to Brooklyn with his wife and children to visit Herman’s parents. Leon would show his in-laws tremendous respect, making sure that Herman’s mother who developed Alzheimer’s at a relatively young age participated in all family events. After Herman’s mother passed away, Leon took pains to look after his father-in-law, who lived to 91. “Never did my father feel lonely since he spent so many holidays and weekends in Leon’s home. There is no doubt in my mind that the way Leon honored and cared for my father prolonged his life.”

11. Rose Zissy Fried (niece)

Mrs. Fried, a Licensed Clinical Social Worker, writes how it was Leon who provided her with “emotional nurturing, physical support, and practical guidance” after her father passed away in a tragic drowning accident when she was only five years old. Leon has acted as a surrogate father to her and her large family.

12. Akiva Hirsch (Father of Leon's Son-in-Law)

Mr. Hirsch writes that when they were considering a match with Leon's daughter, what impressed them most "was the fact that Leon was someone in the community that many

relied on. Many individuals I know, constantly sought Leon's counsel for his keen advice."

[REDACTED]

Through it all, however, Leon "doesn't give up and seeks to enlighten others."

13. Baila Hirsch (granddaughter)

Baila describes how she and all the grandchildren look forward to the start of the Jewish month when Leon makes sure to get all of her cousins special seven-layer cake "to start the month with something sweet." Baila describes the close familial relationship Leon has with her and her cousins and how he is always looking out for their wellbeing.

14. Chana Malka and Sura Faigy Hirsch (granddaughters)

These two granddaughters reiterate what a wonderful grandfather Leon is. "He is always ready to help. Whenever we need a ride he will gladly take us. Any time we need help with an assignment he would give us ideas or information. He shows interest in what we learn. We can write and write and never stop writing about him! Our grandparents will always welcome us and make us feel comfortable when necessary. For example, when our mother had a baby or when we painted our house, he always keeps us busy with interesting stories that will teach us something."

15. Esther Hirsch (granddaughter)

Esther indicates that she goes to her grandparents' home every Friday to help them prepare for the Sabbath and she has formed a really close relationship with her grandparents. Even when she's feeling down, Esther goes knowing that the "warm atmosphere" and the "good feelings" will inevitably cheer her up. Esther along with her cousins are all praying for her grandfather's complete recovery.

16. Yita Hirsch (daughter)

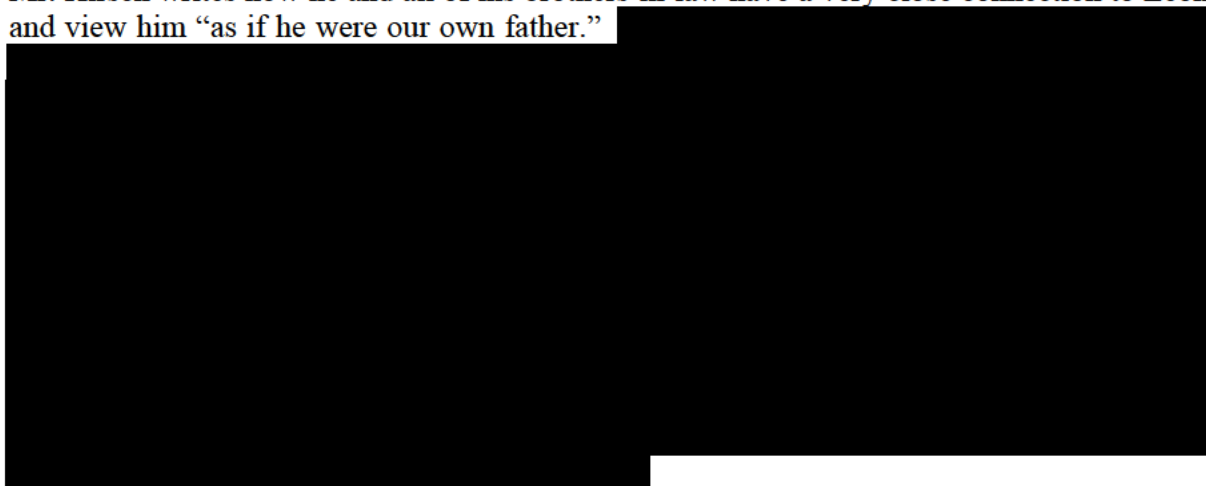
Yita Hirsch describes how Leon sees driving a car as simply a means to help others.

At all times, from morning to night, whenever my father would drive in his car, he has others in mind. My father would constantly call me "Do you need a hitch to work, I'm in the car anyway" or "I'm passing by a store you wanted to get to, did you get what you needed, yet?" Some people already know to calculate what time they should leave work, to see Mr. Klein passing by who would offer them a ride home. And therefore, he intentionally would make an effort to pass by these locations so that he could offer them a ride home. With little fanfare my father's good-hearted generosity was overflowing.

When Yita mentioned to Leon that the school where she worked needed furniture and toys, it was Leon who donated furniture sitting in a vacant office building he owned and arranged for the purchase of the needed toys. Leon is extremely close with all of his children and grandchildren but he doesn't limit his help to family. "Many needy people come to my parent's home, finding their place in their home, with my father. He listens to all of them intently. He gives them wise advice and guides them fatherly. He doesn't let them go until they are settled and stable to be on their own. Some he guides them to a successful position, with others he helps settle disputes, yet other he assists in their marriages. He is there to provide others with whatever they need."

17. Moshe Samuel Hirsch (son-in-law)

Mr. Hirsch writes how he and all of his brothers-in-law have a very close connection to Leon and view him "as if he were our own father."



18. Esther Klein (daughter)

Esther, Leon's youngest daughter, describes the loving home she grew up in, and the overriding message of the importance of giving to others. When it came time for her to get a job, her father advised her to take a job working at the school where she had studied even if it would earn less money. "My father explained to me then, that working in school means extending yourself to others which is much more beneficial in the real purpose of life." Leon's home is open to all, and he goes out of his way to help others and Esther recalls how she "used to overhear countless conversations in which [Leon] helped people by lending a listening ear and easing them in their emotional struggles."

19. Rifka Lea Klein (wife) (Exhibit E)

Rifka Lea, Leon's wife describes for the Court the emotional ordeal that they have been going through



to be interrupted because both of them contracting Covid, the later resumption of

[REDACTED]

Rifka Lea also describes what a wonderful and caring parent Leon is to his children. Leon intentionally ran his business from a home office so that he would be close by to assist with the care of the children. Moreover, Leon lives to help and assist others. Rifka Lea describes how on “many occasions I’ve met random people in the community who have told me, your husband saved my marriage! Another person told me, your husband gave purpose to my life, and helped me out of my depressed state. Leon did this all in a modest and unassuming way.” That same desire to help others compelled Leon to volunteer on a committee that would meet members of the community that got in trouble with the school or with their kids, a task that he has took upon himself for 15 years. “This activity took quite a bit of his time during the week phone calls and meetings with the individuals and sometimes with their close family members. For the sensitivity of those cases, which couldn’t be in public offices he asked me to allow some of the meetings in my house. **Of course, when nobody was home.**” Indeed, two days after his arrest, Rifka Lea received a call from an anonymous caller who called to say that “he was aware of Leon’s arrest but he just wanted to call to say that he owed his life to Leon and that he would be praying for him.”

20. Rabbi Steven Klein (nephew and community activist)

Rabbi Steven Klein is Leon’s nephew and the Rabbi of a synagogue devoted to troubled young adults. Rabbi Klein credits Leon for his guidance when he was growing up sharing life experience and wisdom with him and challenging him to succeed. Now that Rabbi Klein leads his own congregation, Leon assists and connects him with appropriate help and support when a particular issue arises for which Rabbi Klein needs assistance. “I cannot think of a time that he told me that it was not a good time right now. Instead, he would deal with the issue at hand as if it was his own problem and every human being was like his own child.”

21. Yehuda Zev Klein (son-in-law)

Yehuda Zev is married to Esther. Like many others, he describes how Leon constantly assists him. When it came to acquiring and building a business, Leon “would spend long night, at times until 3-4am helping me through the acquisition.” Yehuda Zev describes Leon’s devotion to Mitzvah observance, [REDACTED]

22. David Landau (community member)

Mr. Landau is the director of the largest boy's school in Monroe, New York. When Covid first hit the community, Leon stepped up to the plate in coming up with ideas to provide for the students' needs during Covid, and after researching what would be best for them, he did not stop there but worked on implementing those ideas. "There is no question that his generosity helped to keep the children occupied for hour on end during a time of crisis."

23. Yakov Wolf Lebowitz (friend)

Mr. Lebowitz is a life-long friend of Leon's. "He would always be ready to give. Should it be a listening ear, a helping hand or whatever it might be. My father used to reside at my house. When we met in synagogue in the morning, Leon would not leave the synagogue before my father finished his prayers, so that he could ride my father home."

24. Channie Lev (daughter)

Like her sisters, Channie holds her father in the highest esteem, and she turns to him whenever she's in need of advice. Leon is always there to assist. When she had an accident at 3 AM it was Leon who came in middle of the night to help her. [REDACTED]

25. Zev Lev (son-in-law)

Zev is Channie's husband and corroborates what his wife describes regarding how much [REDACTED]

[REDACTED]. Zev also writes about the care and respect Leon would provide to his mother:

We were once all gathered in a happy family moment ready to start a meal. The hot soup was just served when he got a phone call. The nurse was on the line that grandma isn't feeling well; she was checking if grandma needs to be taken to the hospital. We were astounded to see how Leon instantly put down the spoon which he didn't even had a chance to taste and left the event with his gathered large family to assist his elderly mother. He went to be near her as she was taken to the hospital, not even knowing how many hours he'll be away from his own family.

26. Zissy Lev (granddaughter)

Zissy, the oldest Lev daughter, writes how her grandfather "speaks to us, calms us, and listens to us" and "guides us through our difficult days" while her parents are dealing with their daughter who is on a ventilator and has a host of medical issues.

27. M [REDACTED] L [REDACTED] (recipient of Mr. Klein's beneficence)

Mr. I [REDACTED] views Leon as his “lifesaver.” He arrived from Israel alone, he got married but was having trouble adapting to his new environment. Leon noticed that he was in need of help. “From that very day he accepted me as part of his family . . . He always had a listening ear to my worries, provided me with crucial emotional support and guided me through all my struggles. I was finally able to adjust accordingly, build a home of my own, build a family, and build my future. I could not have done it without Leon. He was absolutely not obligated to do even a bit for me, yet his benevolence and passion made him go out of his way despite his own busy schedule to help a person in need.”

28. Wolf Mendlovic (neighbor)

Mr. Mendlovic is effusive in his praise for Leon. “Living so many years so close by, I have witnessed so many episodes of his fine character both happy and sad and I have learned how one is to conduct oneself during all times.” [REDACTED]

[REDACTED]

29. Levi Ostreicher (community member)

[REDACTED]

30. Joel Polatsek (community member)

Joel Polatsek operates a school bus company. Inevitably there are minor accidents between the buses and cars driving or parked on the road. Mr. Polatsek has dealt with all types of responses, but Leon’s response was unique. After a bus driver accidentally dented the door of Mr. Klein’s car, they reached out to Leon to arrange for compensation. Leon’s response was “You shouldn’t pay me a dollar. I will take care of it myself. You already pay me, by taking my children and grandchildren to school.”

31. Victor Rosenberg (neighbor)

Victor has been neighbors with Leon for the past 37 years. Victor attests to the fact that Leon “would never hesitate to go the extra mile for another human being.” When Victor needed to build a ramp on their shared house to accommodate his elderly mother, Leon “did

not hesitate to consent to the ramp” even though “this greatly affected the aesthetics of our shared house.”

32. Baila Schwartz (granddaughter)

Like her cousins, Baila writes how her grandfather “has always and still does play a major role in her life. For as long as I can remember, my grandfather has always taken care of me as if I was his only grandchild.” [REDACTED]

”

33. Joseph and Malky Silberstein (niece and nephew)

The Silbersteins describe how when they were first married and needed to get out of the city for the summer, it was Leon and his wife who opened up their homes to them, a situation that repeated itself for the next 10 years. “To date we have not repaid this favor, that’s not what Leon is about, we wish we would be able to, one day!!”

34. Meir Moshe Spitzer (family friend)

Meir is the son of Leon’s close friend. Meir writes how Leon would assist his family in driving them to Brooklyn for the Holidays but could not afford it. And when in middle of the night Meir’s grandmother took ill, it was Leon they reached out to who immediately drove Meir’s father so that he could be at his mother’s bedside.

35. Mordche Spitzer (family friend and long-time study partner)

Mordche has known Leon for decades and for 35 years up until Leon took sick they were morning study partners together. “While I still meet Leon every morning in the Synagogue for prayer services [REDACTED]

36. Rabbi Jacob Tannenbaum (friend)

Rabbi Tannenbaum has known Leon since their youth when they were growing up together in Montreal, Canada. “Mr. Klein was even then a very warm, caring person and an accomplished student. He was always concerned about the well-being of all his friends and classmates.” According to Rabbi Tannenbaum, Leon’s “favorite pastime is doing for others – for his fellow jews as well as for all mankind. Whether it be to offer a car ride or helping out on some communal committee, or a charity cause, Mr. Klein is there at the right moment with monetary help and moral support.”

37. Rabbi Hillel Teitelbaum (community leader)

Rabbi Teitelbaum writes that he heads a committee that serves as a mediator between the school administration and the parent body. With an enrollment of some 10,000 students there are bound to be issues which the committee seeks to resolve. For the past 18 years, Leon has been a volunteer member and participated in the weekly meetings. Since Leon took ill and can no longer attend in person, the committee still reaches out to him by telephone.

38. Rabbi Shulem Weberman (school principal)

Rabbi Weberman is one of the principals at the UTA Girls School where Leon's six daughters attended. Leon always "lends an ear to the needs of the community, and who has given of himself without any expectation of thanks or publicity." When the need arose for a summer camp, "Mr. Klein spent many countless hours and days searching for a suitable location, and then driving out to inspect potential sites to assure that the children would benefit from the most suitable location. Mr. Klein did not rest until the plans were complete all for the benefit of the students and staff."

39. Sarah Weiss (daughter)

Sarah Weiss is the second Klein daughter. She was born with a dislocated hip and Leon expended great efforts to provide the best treatment for his daughter, even if it meant traveling around the country to find it. "After I recovered, I still went for yearly exams. My father, with his positivity, converted this into an exciting family trip."

[REDACTED]. He would make the hour-long drive to and from the hospital several times not looking at his lack of sleep and busy schedule, and guided us through his sickness to his full recovery." And after the birth of each of her 10 children, Leon would make the drive to Manhattan to bring her fresh warm food. "My father is always here to help me and my family. If one of my kids would miss their school bus, we all know a car service is not always available but Grandpa's Taxi forever is. Never would he say no to any favor asked."

40. Shloimy Weiss (grandson)

Shloimy describes how he has a phone study session in the Talmud with Leon on a nightly basis. "My grandfather always acts like he has all the world's time to listen and explain everything clearly to [me], so that I am not left with any questions after our studying session, whether it concerns the texts we were studying or issues that I may be dealing with in life."

41. Solomon Witriol (brother-in-law)

Solomon has known Leon for close to fifty years. Leon "was and is always (reasonably) ready and willing to help his acquaintances in need and many times also strangers whether by financial assistance (per his affordability), and by sharing sensible advice and comfort

utilizing his inherent talents which is usually quite beneficial to those recipients, due to his evident intelligence, to disbursing kind advice and or inducing and creating confidence and support to those who were in dire conditions by finding proper logic to convince and illuminate them how things are going to work out for the good.”